



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GMP:AG
F. #2009R01065

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 7, 2018

By ECF

A. Eduardo Balarezo, Esq.
400 Seventh Street, N.W.
Suite 306
Washington, D.C. 20004

William B. Purpura, Esq.
8 East Mulberry Street
Baltimore, MD 21202

Jeffrey H. Lichtman, Esq.
11 East 44 Street, Ste 501
New York, NY 10017

Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Counsel:

The government's next production of supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure is enclosed. This production includes material that is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order. See Dkt. No. 57. This discovery production supplements previous productions on February 14, 2017, March 8, 2017, April 10, 2017, May 5, 2017, June 7, 2017, July 21, 2017, August 11, 2017, September 19, 2017, October 17, 2017, November 7, 2017, November 21, 2017, January 19, 2018, February 12, 2018, March 19, 2018, April 16, 2018, May 18, 2018, May 25, 2018, June 05, 2018, June 25, 2018, August 10, 2018, September 14, 2018, October 05, 2018, October 10, 2018, October 16, 2018, October 19, 2018, November 2, 2018, November 16, 2018, and November 25, 2018. The government also requests reciprocal discovery from the defendant.

The Government's Discovery

000333751-000333751

Photo

Pursuant to 18 U.S.C. § 3500, the government is also disclosing to you the enclosed material related to its anticipated law enforcement and cooperating witnesses at trial. This production supplements the government's production of such material on July 5, 2018, September 5, 2018, October 5, 2018, October 19, 2018, November 2, 2018, and November 9, 2018. See Dkt. No. 260. It includes material that is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order. See Dkt. No. 57. The government will disclose additional § 3500 material related to its law enforcement and cooperating witnesses as it becomes available.

If you have specific questions about the government's discovery and § 3500 productions, please reach out to the prosecution team.

Very truly yours,

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

ARTHUR G. WYATT, CHIEF
Narcotic and Dangerous Drug Section
Criminal Division,
U.S. Department of Justice

OF COUNSEL:

ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY
Southern District of Florida

cc: Clerk of the Court (BMC) (by ECF) (without enclosure)

Enclosure